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Attorneys for Alejandro Francisco Sánchez-Mujica as Foreign Representative of Vitro, S.A.B. de C.V.

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

VITRO, S.A.B. de C.V.,

Debtor in a Foreign Proceeding.

Chapter 15

Case No. 11-11754 (SCC)

NOTICE OF FILING AND HEARING ON PETITION UNDER CHAPTER 15 OF THE UNITED STATES BANKRUPTCY CODE

PLEASE TAKE NOTICE that on April 14, 2011, Alejandro Francisco Sánchez-Mujica (in such capacity, the "Petitioner"), as the duly-appointed foreign representative of Vitro, S.A.B. de C.V. ("Vitro SAB"), filed the form chapter 15 petition (the "Form Petition") and Verified Petition for Recognition of Foreign Main Proceeding and Request for Related Relief (together with the Form Petition, the "Chapter 15 Petition"), pursuant to chapter 15 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (as amended, the "Bankruptcy Code"), with the United States Bankruptcy Court for the Southern District of New York (the "Bankruptcy Court").

PLEASE TAKE FURTHER NOTICE that, among other things, the Chapter 15 Petition seeks the entry of an order (i) recognizing the voluntary judicial reorganization proceeding (the "Voluntary Mexican Proceeding") commenced on December 13, 2010 under the Ley de Concursos Mercantiles (the "Mexican Business Reorganization Act") and currently pending before the Federal District Court for Civil and Labor Matters for the State of Nuevo

León, the United Mexican States (the "<u>District Court of Nuevo León</u>"), as a foreign main proceeding pursuant to sections 1515 and 1517 of the Bankruptcy Code, and (ii) granting related relief pursuant to sections 1520 of the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE that the Bankruptcy Court has scheduled a hearing to consider the relief requested in the Chapter 15 Petition for 2:00 p.m. on May 11, 2011 (the "<u>Recognition Hearing</u>") in Room 610 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York.

PLEASE TAKE FURTHER NOTICE that the Recognition Hearing may be adjourned from time to time without further notice other than an announcement in open court, or a notice of adjournment filed with the Bankruptcy Court, of the adjourned date or dates at the hearing or any other further adjourned hearing.

PLEASE TAKE FURTHER NOTICE that copies of the Chapter 15 Petition and all accompanying documentation are available to parties-in-interest on the Bankruptcy Court's Electronic Case Filing System, which can be accessed from the Bankruptcy Court's website at http://www.nysb.uscourts.gov (a PACER login and password are required to retrieve a document) or upon written request to the Petitioner's U.S. counsel (including by facsimile or e-mail) addressed to:

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PLEASE TAKE FURTHER NOTICE that any party-in-interest wishing to submit a response or objection to the Verified Petition or the relief requested therein must do so in accordance with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, the Interim Bankruptcy Rules, and the Local Rules for the United States Bankruptcy Court for the Southern

District of New York, and in writing and setting forth the basis therefor, which response or objection must be filed electronically with the Bankruptcy Court by registered users of the Bankruptcy Court's electronic case filing system in accordance with General Order M-242 (a copy of which may be viewed on the Bankruptcy Court's website, http://www.nysb.uscourts.gov) and by all other parties-in-interest on a 3.5 inch disc, preferably in Portable Document Format (PDF), Word Perfect or any other Windows-based word processing format, which disc shall be sent to the Office of the Clerk of the Court, One Bowling Green, New York, New York 10004-1408. A hard copy of any response or objection shall be sent to the Chambers of the Honorable Shelley C. Chapman, United States Bankruptcy Judge, One Bowling Green, New York, New York 10004-1408 and served upon Milbank, Tweed, Hadley & McCloy LLP (Attn: Dennis F. Dunne, Esq., Risa M. Rosenberg, Esq., Jeremy C. Hollembeak, Esq. and Andrew M. Leblanc, Esq.), U.S. counsel to the Petitioner, so as to be received by no later than May 6, 2011 at 4:00 p.m. (New York time).

PLEASE TAKE FURTHER NOTICE that all parties-in-interest opposed to the Chapter 15 Petition or the request for relief contained therein must appear at the Recognition Hearing at the time and place set forth above.

PLEASE TAKE FURTHER NOTICE that if no response or objection is timely filed and served as provided above, the Bankruptcy Court may grant the relief requested in the Chapter 15 Petition without further notice.

Dated: New York, New York April 15, 2011

/s/ Dennis F. Dunne

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